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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues
12 Against:

13 **JESSICA ASHLEY CHRISTOPHERSON**
1075 N. Miller Road, 147
14 Scottsdale, AZ 85257

15 Applicant.

Case No. *2011-899*

STATEMENT OF ISSUES

17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Statement of Issues solely
20 in her official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),
21 Department of Consumer Affairs.

22 **Application for Licensure by Endorsement**

23 2. On or about June 26, 2010, the Board received an Application for Licensure by
24 Endorsement from Jessica Ashley Christopherson ("Applicant"). On or about June 21, 2010,
25 Jessica Christopherson certified under penalty of perjury to the truthfulness of all statements,
26 answers, and representations in the application. The Board denied the application on November
27 5, 2010.

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3. Section 2736 of the Business and Professions Code (“Code”) provides, in pertinent

(a) A board may deny a license regulated by this code on the grounds that the applicant has one of the following:

(3) (A) Done any act that if done by a licentiate of the business or profession in question, would be grounds for suspension or revocation of license.

5. Code section 2761 states, in pertinent part:

(f) Conviction of a felony or of any offense substantially related to the qualifications, functions, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof.

(Criminal Conviction)

6. Applicant's application is subject o denial pursuant to Code sections 2761,

a. On or about January 20, 2009, in the Municipal Court, City of Tempe, Maricopa

1 13-2904A1 (disorderly conduct), a misdemeanor. The circumstances of the crime are that on
2 October 25, 2008, Applicant was involved in a verbal altercation with her boyfriend, which led to
3 her arrest for disorderly conduct and failure to identify herself to police officers.

4 **SECOND CAUSE FOR DENIAL OF APPLICATION**

5 **(Committed Acts Which if Done by a Licentiate Would Constitute Cause for Discipline)**

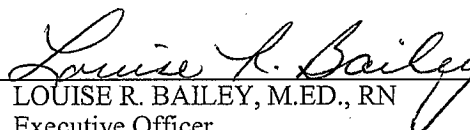
6 7. Applicant's application is subject to denial pursuant to Code section 480 subdivision
7 (a)(3)(A), in that Applicant committed acts which if done by a licentiate constitute cause for
8 discipline pursuant to Code section 2761, subdivision (f).

9 **PRAYER**

10 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
11 and that following the hearing, the Board of Registered Nursing issue a decision:

- 12 1. Denying the application of Jessica Christopherson for a Registered Nurse License;
13 and,
14 2. Taking such other and further action as deemed necessary and proper.

15
16 DATED: 5/4/2011


LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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